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March 5, 2025

Via ECF

The Honorable Nitza I. Quiñones Alejandro
8613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: *Litepanels, Ltd. and Vivendum Production Solutions, Inc. v. GVM Photographic Equipment Inc.*, No. 24-mc-00053-NIQA

Dear Judge Quiñones Alejandro:

We write in reply to the letter filed yesterday (ECF 18) by Plaintiffs in this matter. My colleagues and I represent Third-Party Jian Cheng Technology Inc. (“JCT”).

Plaintiffs have asked for expedited resolution of JCT’s Motion to Vacate Writ of Execution and Set Aside U.S. Marshal’s Sale of Personal Property Due to Plaintiff’s Failure to Follow Procedures Required by Law (ECF 11) (“motion to Vacate”). JCT has the following comments on that request.

Plaintiff’s request is unsupported by a declaration of facts or any documentary proof that the auctioneer and the purchaser have contacted Plaintiffs and that the purchaser “has indicated that they may soon demand the return of their purchase funds if they are unable to take possession of the purchased property.”

Plaintiff’s concern about “a substantial risk that the proceeds from this sale will be lost” ignores the competing risk that JCT will be deprived of its property without due process of law. It also ignores the reality that the property was sold for \$272,500 when Plaintiffs have admitted that the retail value of the property was

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March 5, 2025
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\$1,412,938.83. See attached email and spreadsheet to JCT's counsel Alan Sack from Plaintiffs' representative Fred Fellmeth. This sale process was extremely unfair and prejudicial to JCT.

Plaintiffs suggest that this situation is the fault of JCT in not acting sooner. But that ignores the reality that Plaintiffs went forward with the sale full well knowing that JCT was preparing to ask the Court for relief, and it refused to postpone the sale. See ECF 11-1 at 8-9.

JCT objects to Plaintiff's effort to re-argue the points it made in its Response in Opposition to the Motion to Vacate (ECF 17). That Opposition is deficient on its face, as it is it is unsupported by a declaration of facts and, while it does attach some unverified documents, most of the assertions made in it lack any support whatsoever.

JCT requests oral argument on the Motion to Vacate. It also requests permission to file a reply brief addressing the points made by Plaintiffs in their Response in Opposition. This will likely include a declaration of facts from JCT's President that will need to be prepared with the help of a Chinese translator. Therefore, JCT respectfully requests that it be permitted two weeks from today (until March 19, 2025) to file a reply brief.

JCT has no wish to delay these proceedings, but it opposes Plaintiff's request for expedited resolution if that means that JCT will not have a chance to be heard fully on the Motion to Vacate including a chance to respond to the points made in Plaintiffs' Response in Opposition to the Motion to Vacate.

Very truly yours,



Stephen G. Harvey

Counsel: Alan M. Sack
SACK IP Law p.c.

Attachment (email and spreadsheet to JCT's counsel Alan Sack from Plaintiffs' representative Fred Fellmeth)

cc: All counsel of record via ECF

GVM levy inventory

External Inbox/Clients & Dockets/JCT-LATU-Litepanels et al v. GVM-Jack Xu-235/Correspondence with Opposing Counsel

Summarize this email



Fred Fellmeth <Fred.Fellmeth@videndum.com>

Fri, Nov 8, 2024, 5:31 PM



to me

Alan,

Nice to "meet" and chat, thanks.

Attached is the consolidated inventory we took at service of the Writ.

There are products we did not "catch" in this as the warehouse was piled with boxes making some inaccessible. So these counts are as to what we could actually see and photograph. The original excel doc has the photos attached and is too large to realistically email.

This should give you a read on the retail value. Clearly the wholesale value is lower – B&H needs its cut of course.

Best,

Fred

Fred Fellmeth

General Counsel

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GVM Stock Take
October 30,2024

| Section | SKU | QTY | Notes | Boxes | Pieces Per Box | TOTAL QTY PER SKU | B&H SALE PRICE (US\$) | VALUE (US\$) | |
|-------------------------------|---|-----|--|-------|----------------|----------------------|--------------------------|--------------|----------------------|
| J&J FRONT DOOR AREA | 120-240V AC | 400 | | | | 400 | SKU not @ B&H | | |
| D5 | 8077GZK5J7 | 45 | Black 480 Video Light | 9 | 5 | 45 | SKU not @ B&H | | |
| J&J BY OFFICE | 9V3A POWER ADAPTER | 108 | | | | 108 | SKU not @ B&H | | |
| J&J FRONT DOOR SIDE: RED RACK | B009T3D5WWZ | 100 | DESK PAD | | | 100 | SKU not @ B&H | | |
| J&J 1 No Window | GVC-360 | 10 | | | | See J10 | | | |
| J&J 1 No Window | GVC-360 | 25 | | | | 35 | 159.00 | 5,565.00 | |
| J&J1 | GVGTQ80 | 20 | | | 10 | 20 | 109.00 | 2,180.00 | |
| CA12 | GVM-1000D-3L-KIT | 140 | | | | 140 | 429.00 | 60,060.00 | |
| J&J1 | GVM-10L1052L | 6 | | | | 6 | SKU not @ B&H | | |
| J&J 1 No Window | GVM-1200D | 12 | | | | See J15 | | | |
| J&J 1 No Window | GVM-1200D | 14 | | | | 26 | 239.00 | 6,214.00 | |
| J&J2 | GVM-1200D3L KIT | 8 | | | | See J18 | | | |
| J&J2 | GVM-1200D3L KIT | 15 | | | | See J18 | | | |
| CA21 | GVM-1200D-3L-KIT | 170 | | | | 193 | 524.00 | 101,132.00 | |
| CA19 | GVM-1300D-2L | 180 | | | | 180 | SKU not @ B&H | | |
| J&J 1 No Window | GVM-430D160 | 32 | | | | 32 | SKU not @ B&H | | |
| D3 | GVM-480 LS B2L | 660 | 2Pack LED VideoLighting/480 LED | | 1 | 660 | SKU not @ B&H | | |
| J&J2 | GVM-50RS-2L | 2 | | | | 2 | 278.00 | 556.00 | |
| CA15 | GVM-50RS-3L & GVM-800D-II-1L | 90 | | | | 90 | 339.00 | 30,510.00 | Using GVM-50RS-3L |
| J&J2 | GVM-50SM2L | 90 | Picture at 11:20am | | 90 | See J25 | | | |
| J&J1 | GVM-50SM-2L | 2 | | | | 92 | 519.00 | 47,748.00 | |
| J&J2 | GVM-50SM3L | 6 | | | | 6 | 749.00 | 4,494.00 | |
| J&J2 | GVM-520LSB | 4 | | | | 4 | 238.99 | 955.96 | |
| J&J1 | GVM-520SB2L | 44 | | | | 44 | 199.99 | 8,799.56 | |
| J&J1 | GVM-520W | 29 | BAGS | | | See J30 | | | |
| J&J1 | GVM-520W | 4 | | | | 33 | SKU not @ B&H | | |
| J&J2 | GVM-672SB30 | 2 | | | | 2 | SKU not @ B&H | | |
| CA20 | GVM-672S-B3L & GVM-1000D-2L-SOFTBOX | 126 | | | | 126 | 463.99 | 58,462.74 | Using GVM-672S-B3L |
| CA1 | GVM-680RS-3L | 12 | | | | 12 | SKU not @ B&H | | |
| J&J FRONT DOOR SIDE: RED RACK | GVM-7SM | 6 | | | | 6 | 129.00 | 774.00 | |
| F4 | GVM-800D | 50 | | 50 | | 50 | 99.00 | 4,950.00 | |
| F1 | GVM-800D II | 50 | Pallet ready to shrink wrap | 50 | | 50 | SKU not @ B&H | | |
| J&J1 | GVM-800D-11-3L | 255 | stands, open boxes | | 17 | See J38 | | | |
| J&J1 | GVM-800D-11-3L | 90 | | | 6 | 345 | SKU not @ B&H | | |
| CA8 | GVM-800D-II-2L | 238 | | | | 238 | SKU not @ B&H | | |
| CA3 | GVM-800D-II-2L & GVM 480LS B2L & GVM-PRO-SD650B | 41 | | | | 41 | 848.00 | 34,768.00 | Using GVM-PRO-SD650B |
| J&J FRONT DOOR AREA | GVM-80FX | 2 | | | | 2 | 39.00 | 78.00 | |
| J&J FRONT DOOR AREA | GVM-80YU | 44 | | | 2 | 44 | 39.00 | 1,716.00 | |
| CA18 | GVM-850D-3L | 21 | | | | 21 | SKU not @ B&H | | |
| J&J3 | GVM-880RS2L | 66 | | | | 66 | SKU not @ B&H | | |
| J&J4 | GVM-880RS3L | 35 | | | | 35 | SKU not @ B&H | | |
| J&J SHELF | GVM-8RS | 60 | | | | 60 | 59.00 | 3,540.00 | |
| J&J3 | GVM-B200C | 88 | | | | See J50 | | | |
| J&J3 | GVM-B200C | 44 | | | | See J50 | | | |
| J&J3 | GVM-B200C | 44 | | | | See J50 | | | |
| J&J3 | GVM-B200C | 44 | | | | 220 | 699.00 | 153,780.00 | |
| CA5 | GVMBD1002P | 60 | | | | 60 | 398.00 | 23,880.00 | |
| J&J2 | GVM-BD25R | 7 | | | | 7 | 147.00 | 1,029.00 | Using GVM-PRO-BD25R |
| J&J FRONT DOOR AREA | GVM-BDR | 180 | | | 18 | 480 | 39.00 | 18,720.00 | |
| J&J1 | GVM-BDT20R | 204 | | | 17 | 204 | 39.00 | 7,956.00 | |
| J&J1 | GVM-BI COLOR CRI97 | 9 | | | | 9 | SKU not @ B&H | | |
| J&J SHELF 2 | GVM-BV160 | 104 | | | | See J58 | | | |
| J&J SHELF 3 | GVM-BV160 | 104 | | | | See J58 | | | |
| J&J BY OFFICE | GVM-BV160 | 24 | | | | 232 | 164.00 | 38,048.00 | |
| J&J FRONT DOOR SIDE: RED RACK | GVM-BV95 | 40 | GVM-V MOUNT BAT | | | 40 | 124.00 | 4,960.00 | |
| J&J1 | GVM-C320 | 30 | | | 15 | 30 | 139.00 | 4,170.00 | |
| J&J FRONT DOOR SIDE: RED RACK | GVM-CL22 | 80 | | | | 80 | 19.00 | 1,520.00 | |
| | GVM-CTX 36 | 20 | | 20 | | 20 | SKU not @ B&H | | |
| J&J2 | GVM-DJ200D | 10 | | | | 10 | SKU not @ B&H | | |
| J&J2 | GVM-DJ280B | 5 | | | | 5 | SKU not @ B&H | | |
| D10 | GVM-DL 85 R | 72 | GVM Lantern 33" (one opened not counted) | 18 | 4 | 72 | 119.99 | 8,639.28 | |
| F3 | GVM-DL65R | 26 | | 26 | | 26 | 99.99 | 2,599.74 | |
| F14 | GVM-F60 | 28 | | 28 | | 28 | 209.00 | 5,852.00 | |
| J&J2 | GVM-G100W | 4 | | | | See J69 | | | |
| J&J 1 No Window | GVM-G100W | 44 | | | | 48 | 258.00 | 12,384.00 | |
| D13 | GVM-GR-120 QD | 70 | Video Carbon Fiber Motorized Camera Slider | 35 | 2 | See J71 | | | |

| | | | | | | | | | |
|-------------------------------|-----------------------------------|-----|---|-----|----------|---------|---------------|------------|--|
| D12 | GVM-GR-120 QD | 42 | 120 Electric Side motor models | 21 | 2 | 112 | 349.00 | 39,088.00 | Using GVGP120QD / GP-120QD - matches product description |
| J&J4 | GVM-GR80QD | 46 | | | 23 | 46 | SKU not @ B&H | | |
| J&J2 | GVM-GTJ120D | 3 | | | | 3 | 299.99 | 899.97 | |
| J&J FRONT DOOR SIDE: RED RACK | GVM-JJLY | 3 | | | | 3 | 159.00 | 477.00 | |
| F5 | GVM-Lantern Softbox | 8 | | | | 8 | | | SKU unknown - many options online |
| D8 | GVM-Light Kit | 16 | | 8 | 1 | 16 | | | SKU unknown - many options online |
| J&J 1 No Window | GVM-LIGHT KIT | 20 | | | See J78 | | | | SKU unknown - many options online |
| J&J 1 No Window | GVM-LIGHT KIT | 28 | | | | 48 | | | SKU unknown - many options online |
| F15 | GVM-LS150D | 29 | | 29 | | 29 | 239.00 | 6,931.00 | |
| J&J2 | GVM-LT100SB3L | 1 | | | | 1 | SKU not @ B&H | | |
| J&J2 | GVM-LT505 | 7 | | | | 7 | SKU not @ B&H | | |
| F11 | GVM-NPF 750 | 19 | | 19 | 25 | 475 | 49.00 | 23,275.00 | |
| J&J FRONT DOOR AREA | GVM-P80 | 13 | | | See J84 | | | | |
| J&J FRONT DOOR AREA | GVM-P80 | 120 | | | | 133 | 119.00 | 15,827.00 | |
| J&J1 | GVM-P805 II 80 W LED VIDEO LIGHT | 324 | | | 18 | 324 | SKU not @ B&H | | |
| J&J GREEN PALLET MOVER | GVM-P80QD | 22 | | | | 22 | 266.49 | 5,862.78 | Using GVGP 80QD |
| F6 | GVM-P80S | 4 | | 2 | 4 | See J88 | | | |
| J&J BY OFFICE | GVM-P80S | 100 | | | | 104 | 119.00 | 12,376.00 | |
| J&J2 | GVM-P80S II | 15 | | | See J91 | | | | |
| J&J FRONT DOOR AREA | GVM-P80S II | 1 | | | See J91 | | | | |
| F12 | GVM-P80S II | 5 | | 5 | | 21 | 159.00 | 3,339.00 | |
| F6 | GVM-P80S II 2D | 12 | | 12 | | 12 | 248.00 | 2,976.00 | |
| CA25 | GVM-PD60B-SET2 & GVM-G200D-KIT | 144 | | | | 144 | 198.00 | 28,512.00 | Using GVM-PD60B |
| J&J FRONT DOOR SIDE: RED RACK | GVM-PD99 | 12 | | | | 12 | 124.00 | 1,488.00 | |
| J&J3 | GVM-PL60B | 35 | | | See J96 | | | | |
| CA14 | GVM-PL60C & GVM-PD60C | 28 | | | | 63 | 309.00 | 19,467.00 | Using GVM-PD60C |
| J&J3 | GVM-PR150D VIDEO | 28 | | | See J99 | | | | |
| J&J3 | GVM-PR150D VIDEO | 68 | | | See J99 | | | | |
| J&J3 | GVM-PR150D VIDEO | 36 | | | | 132 | 219.00 | 28,908.00 | Using GVM-PR150D-SET2 |
| J&J3 | GVM-PR150RSET | 78 | | | See J102 | | | | |
| J&J3 | GVM-PR150RSET | 72 | | | See J102 | | | | |
| J&J3 | GVM-PR150RSET | 68 | | | | 218 | 259.00 | 56,462.00 | |
| F12 | GVM-Pro YU150R | 17 | | 17 | | 17 | 599.00 | 10,183.00 | |
| F13 | GVM-Pro YU300R | 51 | | 51 | | 51 | SKU not @ B&H | | |
| J&J4 | GVM-PROSD300C | 22 | | | 11 | 22 | SKU not @ B&H | | |
| J&J FRONT DOOR SIDE: RED RACK | GVM-PROSD200B | 10 | loose | | | 10 | 239.00 | 2,390.00 | |
| CA11 | GVM-PRO-SD200B-SET1 | 100 | | | | 100 | 239.00 | 23,900.00 | Set not available, using GVM-PROSD200B |
| CA9 | GVM-PROSD-300B | 7 | | | See J109 | | | | |
| CA10 | GVM-PROSD-300B & GVM-DI-C240D | 90 | | | | 97 | 338.00 | 32,786.00 | Using GVM PROSD300B |
| J&J FRONT DOOR SIDE: RED RACK | GVM-PROSD300D | | | | | 1 | SKU not @ B&H | | |
| J&J2 | GVM-PROSD580B | 1 | | | See J114 | | | | |
| J&J 1 No Window | GVM-PROSD650B | 60 | | | See J114 | | | | |
| J&J 1 No Window | GVM-PROSD650B | 35 | | | | 155 | 848.00 | 131,440.00 | |
| J&J 1 No Window | GVM-PROSD650B | 60 | | | | 12 | 1,699.00 | 20,388.00 | |
| F16 | GVM-ProYU600C | 12 | | 12 | | 140 | 49.00 | 6,860.00 | |
| J&J BY OFFICE | GVM-QX6 | 140 | | | | 50 | SKU not @ B&H | | |
| J&J FRONT DOOR SIDE: RED RACK | GVM-REFL110 | 50 | | | | 20 | 99.00 | 1,980.00 | |
| J&J1 | GVM-RGB20W | 20 | | | | 80 | SKU not @ B&H | | |
| J&J2 | GVM-RGBLED BI COLOR | 80 | Picture at 11:15am | | 8 | 80 | SKU not @ B&H | | |
| F6 | GVM-SD 80S (w/softbox) | 36 | 80w Spotlight | 36 | | 36 | 119.00 | 4,284.00 | |
| J&J FRONT DOOR AREA | GVM-SD BOX | 40 | | | | 40 | SKU not @ B&H | | |
| J&J1 | GVM-SD200D | 28 | | | | 28 | 219.00 | | |
| J&J2 | GVM-SD200D - SET1 | 3 | | | See J124 | | | | |
| CA23 | GVM-SD200D-SET1 & GVM-SD300D-SET2 | 108 | | | | 111 | 279.00 | 30,969.00 | |
| CA7 | GVM-SD-200-R | 18 | | | | 18 | 299.00 | 5,382.00 | |
| CA24 | GVM-SD200R-SET2 | 110 | | | | 110 | 339.00 | 37,290.00 | |
| J&J1 | GVM-SD200S | 10 | BAGS | | | 10 | SKU not @ B&H | | |
| CA22 | GVMSD300D-SET2 & GVM-SD200D | 64 | GVMSD300D-SET2, qty 44 & GVM-SD200D, qty 20 | | | 64 | 399.00 | 25,536.00 | |
| F8 | GVM-SD300S | 10 | | 10 | 4 | 40 | 346.00 | 13,840.00 | |
| J&J 1 No Window | GVM-SD600D | 10 | | | | 10 | 749.00 | 7,490.00 | |
| F9 | GVM-SD80D | 63 | | 63 | 4 | 252 | 159.00 | 40,068.00 | |
| J&J FRONT DOOR SIDE: RED RACK | GVM-SD80D | | | | | | | | |
| F10 | GVM-SD80D Set 1 | 232 | | 232 | | 232 | 199.00 | 46,168.00 | |
| F6 | GVM-SD80S | 2 | | 2 | 4 | 8 | 119.20 | 953.60 | |
| D6 | GVM-SF40 | 60 | Soft Box 40cm Small Photo Studio | 60 | 1 | 60 | SKU not @ B&H | | |
| CA13 | GVM-SOFTBOX-600 | 8 | | | | 80 | 48.99 | 3,919.20 | |
| J&J FRONT DOOR SIDE: RED RACK | GVM-SU40D | 187 | | | | 187 | SKU not @ B&H | | |
| J&J1 | GVM-TELE PROMTPER | 2 | | | | 2 | | | SKU unknown |
| J&J3 | GVM-TL600B | 68 | | | 17 | 68 | SKU not @ B&H | | |
| J&J 1 No Window | GVM-TQ-L | 11 | | | See J142 | | | | |
| J&J 1 No Window | GVM-TQ-L | 30 | | | See J142 | | | | |
| J&J 1 No Window | GVM-TQ-L | 16 | | | | 57 | 359.00 | 20,463.00 | |

| | | | | | | | | | |
|-------------------------------|---|---------|--|-----|---|-----|---------------|--------------|------------------------|
| J&J2 | GVM-VMF970 | 66 | | | | 66 | 129.00 | 8,514.00 | |
| J&J 1 No Window | GVM-X0024SEP10 | 60 | | | | 60 | SKU not @ B&H | | |
| CA16 | GVMX0024SEP13 & GVM-PRO-BD45R | 69 | | | | 69 | 299.00 | 20,631.00 | Using GVM-PRO-BD45R |
| J&J 1 No Window | GVM-Y30D160 | 6 | | | | 6 | 119.00 | 714.00 | |
| J&J2 | GVM-Y60D256 | 8 | | | | 8 | 159.00 | 1,272.00 | |
| D11 | GVM-YR20D - SET 4 | 72 | GVM-YR200D - SET 4 | 72 | 1 | 72 | 149.00 | 10,728.00 | Using GVM-YR200D-SET 4 |
| F7 | GVM-YR65K2 | 38 | | 38 | 2 | 76 | SKU not @ B&H | | |
| J&J FRONT DOOR SIDE: RED RACK | GVM-YU1500R | 3 | | | | 3 | SKU not @ B&H | | |
| F13 | GVM-YU600C | 1 | | 1 | | 1 | 1,699.00 | 1,699.00 | |
| D9 | GVM-ZI-21 | 9 | Anchor Stands Kit | 9 | 1 | 9 | 129.00 | 1,161.00 | |
| J&J1 | GVRGB1052L | 15 | TRIPOD | | | 15 | SKU not @ B&H | | |
| CA4 | PN not accessible | 40 | | | | 40 | | | SKU unknown |
| CA6 | PN not accessible | 33 | | | | 33 | | | SKU unknown |
| CA2 | Sliders in black bags, no PN | 36 | | | | 36 | | | SKU unknown |
| | | | Large assortment of unassociated product, | | | | | | |
| | | | | | | | | | |
| F2 | tripods, assorted lights, LED Tube lights, LED Fresnels | unboxed | All appear new but probably (?) returns? | | | | | | SKU unknown |
| D1 | UN3481 | 22 | Lithium Ion Batteries | | 1 | 22 | SKU not @ B&H | | |
| J&J2 | UNIDENTIFIED BOXES SEALED | 30 | | | | 30 | | | SKU unknown |
| J&J2 | UNIDENTIFIED BOXES SEALED | 14 | | | | 14 | | | SKU unknown |
| | | | Completely inaccessible, number of boxes at least | | | | | | |
| F12 | UNKNOWN | 20 | 20 | 20 | | 20 | | | SKU unknown |
| D2 | V002CMTEX9 | 99 | 680 RS 2 Packs Video Light | | 1 | 99 | SKU not @ B&H | | |
| J&J1 | X0024OTJHV | 2 | | | | 2 | SKU not @ B&H | | |
| J&J1 | X002QFNM67 | 2 | | | | 2 | SKU not @ B&H | | |
| J&J BY OFFICE | X003HRH8P9 | 60 | | | | 60 | SKU not @ B&H | | |
| J&J1 | X00431CF4P | 4 | | | | 4 | SKU not @ B&H | | |
| D4 | X004E6VGCX | 42 | GVM 3x 2m Background stand | 7 | 6 | 42 | SKU not @ B&H | | |
| | | | 480 Led temp re digital display - 2 light set with | | | | | | |
| D7 | | 352 | stand | 352 | 1 | 352 | | | SKU unknown |
| | | | | | | | TOTAL | 1,412,938.83 | |